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CERRO COPPER PRODUCTS CO.

A member of The Marmon Group of companies

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March 21, 1989

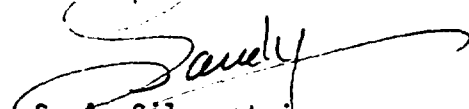
Ms. Susan Franzetti, Esq.
Gardner, Carton & Douglas
321 N. Clark St.
Chicago, IL 60610

Dear Susan:

Enclosed article from a trade publication indicates that another industry was apparently successful in challenging pretreatment regulations. Is there anything we can learn from this that might enhance our situation?

Very truly yours,

CERRO COPPER PRODUCTS CO.
A member of The Marmon Group
of companies


S. A. Silverstein
Manager of Energy and
Environmental Affairs

SAS/ge

cc: J. Patterson
P. Tandler

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New effluent rules end uncertainties

By **WILLIAM SNODDY**
Fairchild News Service

On Feb. 9, the Aluminum Extruders Council and its members started to breathe easier when new aluminum-forming regulations on water consumption and oil and grease alternate monitoring became effective.

The date closed the book on a four-year saga during which both the council and the Aluminum Association filed suit against the Environmental Protection Agency over the stringency of its original proposals.

The suit and the ensuing settlement agreement reached with the EPA has prompted the council to rethink how it follows industry-related regulatory and legislative measures coming out of Washington, according to council president Donn Sanford. "As a council, our primary thrust is marketing, not Washington," he said.

One of the issues to be discussed at the council's 39th annual meeting will be the possible restructuring of its government relations committee, Sanford said. The restructuring would involve the addition of more people for better monitoring of regulatory and legislative issues.

Because the council is a member of the National Association of Manufacturers, which represents a number of trade groups' interests on Capitol Hill, the council itself has had a limited Washington focus.

"We feel we've come to the point where we must become more involved in legislative issues," Sanford said. "We've been more involved in regulatory issues."

The suit against the EPA is an example of that regulatory involvement. It is also an example of why the council needs to enhance its Washington focus, according to Sanford.

In November 1982, the EPA

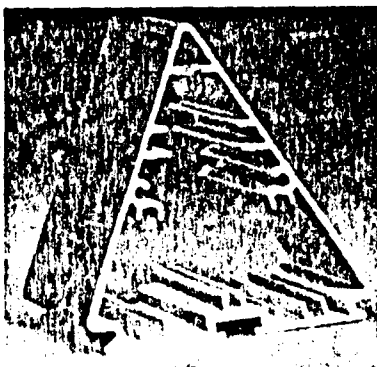
lish effluent limitation guidelines, and 11 months later published the final aluminum-forming rule. It wasn't until after the final regulation was published that the council, the Aluminum Association and some aluminum-forming firms filed petitions to review the regulation.

In April 1985, EPA and the petitioners executed a settlement agreement to resolve all the issues raised with respect to the aluminum-forming effluent limitation guidelines and standards. The amended proposal was published in March 1986, and the petitioners agreed to dismiss their

The cleaning or etching rinse guideline would have reduced the amount of water extruders could use on coated aluminum parts by setting a 90 percent flow reduction cap. The council and the Aluminum Association contended that a 90 percent flow reduction could not be achieved with the best available technology, and that the cost to comply would be exorbitant.

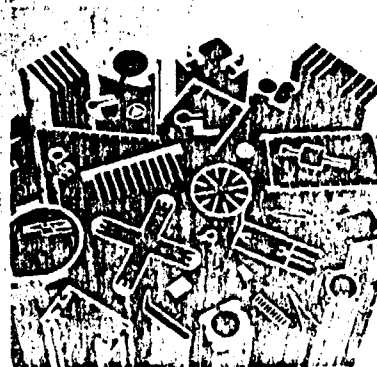
The settlement reached with the EPA decreased the amount of flow reduction to 72 percent.

The oil and grease monitoring is done as an alternative to testing each of 37 organic compounds



EXTRUDED ALUMINUM stand was produced by V.A.W. of America Inc., St. Augustine, Fla., from alloy 6005-T5 with anodized finish.

—Photo courtesy Aluminum Extruders Council



THE RANGE of possible extruded shapes is indicated by a sampling of products of Mideast Aluminum Industries, Dayton, N.J.

—Photo courtesy Mideast Aluminum Industries

petitions for review. The final regulation was published last December.

"That particular battle pointed out the need for us to get involved sooner," Sanford said. "We were in a reactive mode throughout the whole four years rather than in a proactive one. We should have gotten our oars in the water a little further upstream. We were very fortunate to prevail in this case."

The stipulations that were most onerous to extruders involved flow-reduction limitations on the cleaning or etching rinse, and the

because each test costs \$1,000 and complying would be too burdensome to the companies involved. The tests for oil and grease satisfy all the other restrictions on the other compounds.

For water discharged to municipal treatment facilities, the concentrations of oil and grease on which the alternate monitoring guideline was based before the suit were 20 milligrams per liter (mg/l) for the daily maximum and 12 mg/l for the monthly average.

Jack Goldman, manager of environmental services for the

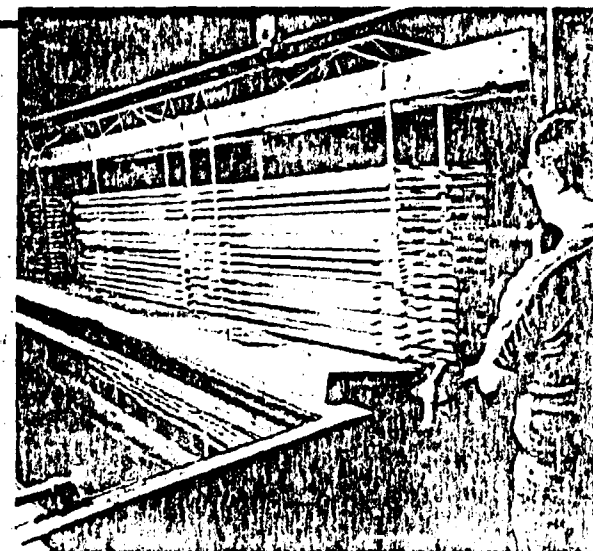
Aluminum Association, said these guidelines were too low because the water would be treated at municipal treatment facilities.

The settlement agreement increased the oil and grease concentration level to 52 mg/l for daily maximum and 26 mg/l average of daily values for any one month.

"By using more water, achieving concentration levels will be easier," Goldman said. The original regulation "gave you less rope." Had the original proposals become effective, "It would have

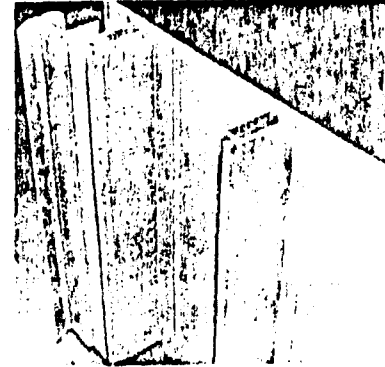
closed a substantial number of the nation's extrusion presses," Sanford said.

For example, during the settlement negotiations, Georgia, one of 39 states authorized by the EPA to set its own permit limits as long as those limits exceed those set by the agency, said that five plants could reach its more stringent limits, according to Goldman. However, three of those plants had to go beyond best available technology and another was forced to shut down, he said.



ANODIZING gives aluminum fresh colors and textures. New EPA guidelines on effluents have made life easier for aluminum extruders and other fabricators.

—Photo courtesy of Mackenburgh-Duncan



CREEL TABLE for textile machines was made by Honsel-Werke AG, Meschede, West Germany, from aluminum alloy 6060.

—Photo courtesy Aluminum Extruders Council